

Hearing Date: May 21, 2019 at 10:00 a.m.
Objection Deadline: May 14, 2019 at 4:00 p.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,) Chapter 11
Debtors.)
) Case No. 18-23538 (RDD)
)
) (Jointly Administered)
)

**NOTICE OF HEARING ON APPLICATION OF NEW YORK STATE ELECTRIC
AND GAS CORPORATION PURSUANT TO SECTION 7 OF THE ORDER (I)
APPROVING DEBTORS' PROPOSED FORM OF ADEQUATE ASSURANCE OF
PAYMENT TO UTILITY PROVIDERS, (II) ESTABLISHING PROCEDURES FOR
DETERMINING ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY
SERVICES, AND (III) PROHIBITING UTILITY PROVIDERS FROM ALTERING,
REFUSING, OR DISCONTINUING UTILITY SERVICE [DOCKET NO. 461] FOR
PAYMENT FROM THE ADEQUATE ASSURANCE ACCOUNT**

PLEASE TAKE NOTICE that a hearing to consider the annexed *Application of New York State Electric and Gas Corporation Pursuant to Section 7 of the Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service [Docket No. 461] for Payment from the Adequate Assurance Account* (the "Application") filed on behalf of New York State Electric and Gas Corporation, by counsel, for the entry of an order requiring the Debtors to immediately tender payment to New York State Electric and Gas Corporation in the amount of \$40,970 from the Adequate Assurance Account for the past due post-petition invoices and tender an additional payment of \$28,824.25 to cover the balance of the \$69,794.25 in past due charges not covered by the purportedly two week amount in the Adequate Assurance Account, will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains New York 10601-4140 (the "Bankruptcy Court") on May 21, 2019 at 10:00 a.m. (Eastern Time) (the "Hearing"), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections (the "Objections") to the Application shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-RM, in text-searchable portable document format (PDF) (with a hard copy delivered directly

to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with General Order M-399 and the *Amended Order Implementing Certain Notice and Case Management Procedures*, entered on November 1, 2018 (Docket No. 405), so as to be filed and received no later than **May 14, 2019 at 4:00 p.m. (Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Application, New York State Electric and Gas Corporation may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Application, which order may be entered without further notice or opportunity to be heard.

Dated: Garden City, New York
April 16, 2019

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

By: /s/ Michael Kwiatkowski
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